



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

OCT - 9 2015

Mr. Lawrence Holley, Facility Manager  
National Archives & Records Administration  
8601 Adelphia Road  
Room 2320  
College Park, MD 20740-6001

Re: Request for Information for the National Archives & Records Administration's Wastewater Treatment Plant

Dear Mr. Holley,

Enclosed please find a Request for Information issued this date pursuant to Section 308 of the Act, 33 U.S.C. § 1318 that requires, among other things, that National Archives personnel provide detailed information regarding compliance of their Wastewater Treatment Plant (NPDES Permit # MD0065871). The requirement to provide EPA with the information requested is mandatory, and you must respond in accordance with the instructions and deadlines set forth in the Request for Information.

Please contact Mr. Michael Greenwald at (215) 814-2398 if you have any questions regarding this Request for Information.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. B. McGuigan", is written over the typed name.

David B. McGuigan, Associate Director  
Office of NPDES Permits & Enforcement  
Water Protection Division

Enclosure





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

In The Matter of:	:	
	:	
	:	Proceeding Under Section 308 of the
	:	Clean Water Act, 33 U.S.C. § 1318
National Archives & Records Administration	:	
8601 Adelphia Road	:	
Room 2320	:	REQUEST FOR INFORMATION
College Park, MD 20740-6001	:	
	:	
	:	
	:	

**I. STATUTORY AUTHORITY**

1. This Request for Information is issued under the authority vested in the United States Environmental Protection Agency (EPA) by Section 308 of the Clean Water Act (CWA or Act), 33 U.S.C. § 1318. The Administrator of the EPA has delegated this authority to the Regional Administrator of EPA Region III who in turn has delegated it to the Director of the Water Protection Division of EPA Region III who in turn has delegated it to the Associate Director of the Office of NPDES Permits and Enforcement. EPA hereby requires that the National Archives & Records Administration's Wastewater Treatment Plant (NARA WWTP), NPDES Permit # MD0065871 provide information described below related to compliance with the CWA.

**II. STATUTORY AND REGULATORY BACKGROUND**

2. EPA is authorized under Section 308 of the Federal Water Pollution Control Act ("Clean Water Act" or "the Act"), 33 U.S.C. § 1318, to require owners and operators of point sources to establish records and make such reports as may be necessary to carry out the purpose of the Act, including but not limited to:
  - (a) Developing or assisting in the development of any effluent limitation, or other limitation, prohibition, effluent standard, pretreatment standard, or standard of performance under the Clean Water Act;
  - (b) Determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance;

- (c) Any requirement under Section 308 of the Clean Water Act; and
  - (d) Carrying out Sections 305, 311, 402, 404, and 504 of the Clean Water Act.
3. Any failure to respond as directed is punishable under the civil and criminal provisions of Section 309 of the Act, which provide for the assessment of penalties, injunctive relief and imprisonment.

You may, if you desire, assert a business confidentiality claim covering all or part of the information requested herein in the manner described in 40 C.F.R. Section 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent and by means of the procedures set forth in Subpart B, 40 C.F.R. Part 2. If no claim of confidentiality accompanies the information requested herein when it is received by EPA, it may be made available to the public by EPA without further notice. This inquiry is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act, 44 U.S.C. Chapter 35. (See 5 C.F.R. § 1320.3(c)).

### **III. INSTRUCTIONS**

- 4. Provide a separate narrative response for each question and for each subpart of each question set forth below. Precede each answer with the corresponding number of the question to which it responds.
- 5. Identify each person responding to any question contained in this Information Request on behalf of NARA WWTP, as well as each person consulted in the preparation of the response.
- 6. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question.
- 7. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question to which it corresponds.
- 8. If tabulation is requested, provide the requested information in tabular form in hard copy and also in tabular form in an electronic spreadsheet file of Lotus 1-2-3, Excel, or ASCII delimited format.

9. If requested information or documents are not known or are not available at the time of your response to this Information Request, but later become known or available, NARA WWTP must supplement its response to EPA. Moreover, should NARA WWTP find at any time after submission of its response that any portion is or becomes false, incomplete, or misrepresents the facts; NARA WWTP must provide EPA with a corrected response as soon as possible.
10. Section 308 of the Act, 33 U.S.C. § 1318, requires NARA WWTP to provide accurate and complete information in response to the questions contained in this request. All submissions provided pursuant to this Section 308 request shall be signed and dated by a responsible official of Rehoboth and must include the following certification:

***"I certify that the information contained in or accompanying this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify as having responsibility for the persons who, acting under my direct instruction, made the verification that this information is true, accurate, and complete."***

Signed \_\_\_\_\_  
Title \_\_\_\_\_

11. Submit your response to:

Mr. Michael Greenwald (3WP42)  
NPDES Enforcement Branch  
Water Protection Division  
U. S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103

12. If you have questions regarding this Information Request, you may contact Mr. Michael Greenwald of the NPDES Enforcement Branch at (215) 814-2398

#### **IV. DEFINITIONS**

The terms "document" and "documents" shall mean any format that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or



format of these types. If in computer format or memory, each such document shall be provided in a translated form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) a copy of each document which is not an exact duplicate of a document which is provided; (b) each copy which has any writing, notation, or the like on it; c) drafts; (d) attachments to or enclosures with any document; and (e) every other document referred to or incorporated into each document.

13. The term "identify" with respect to a natural person means to provide that person's name, address, telephone number, title, and relationship to NARA WWTP. The term "identify" with respect to a business entity means to provide that entity's name, address, and relationship to NARA WWTP, and to provide the name, address, telephone number, and title of an individual who can provide information related to, and on behalf of, the entity.
14. The term "Day" shall mean a calendar day. In computing any period of time under this Request pursuant to Section 308, where the last day would fall on a Saturday, Sunday, federal or state holiday, the period shall run until the close of the next business day.

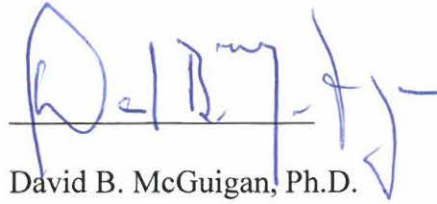
#### **V. INFORMATION REQUESTED**

15. AND NOW, this 7<sup>th</sup> day of October, 2015, NARA WWTP is hereby directed, pursuant to Section 308 of the Act, 33 U.S.C. § 1318, to provide the following information, no later than 30 days from the effective date of this Request for Information:
16. For operations at NARA WWTP, NPDES Permit # MD0065871, with effective permit date of December 1, 2009, expiration date November 30, 2014, and re-application date of October 1, 2012, provide the letter of re-application for permit coverage and the letter of acceptance from Maryland Department of the Environment (MDE). If no re-application letter was submitted or documents are unavailable, please provide an explanation in your response.
17. From January 1, 2012 to present, identify specific steps taken by NARA WWTP to address any effluent exceedance. For the following pollutants, provide the root cause analyses completed to evaluate processes contributing to the effluent exceedance and long term plans to correct the processes to comply with the effluent limits listed in Permit Section I.A:
  - a. Total Residual Chlorine;

**VI. EFFECTIVE DATE**

24. The effective date of this Request for Information shall be the date it is received by the Authority.

Date: 10/7/15

A handwritten signature in blue ink, appearing to read 'D. B. McGuigan', written over a horizontal line.

David B. McGuigan, Ph.D.  
Associate Director  
Office of NPDES Permits & Enforcement  
Water Protection Division

- b. Copper;
  - c. Total Zinc.
18. Provide a copy of site plans with the locations of outfalls identified, stormwater pipes and conveyance, and any effluent discharge from pipes at your facility and the plant.
  19. Provide a copy of the Biomonitoring Study Plan required by Permit Section I.K. With your response include any revisions to the plan and any correspondence from MDE regarding the plan. Include dates of submittal of the plan and acceptance.
  20. Provide all documentation and reports that provide the results of Whole Effluent Toxicity (WET) testing with dates of testing required by the Biomonitoring Study Plan. Include the correspondence and dates of any submissions to MDE. If any WET result documents required by the permit were not provided to MDE or are not available, provide an explanation as to why.
  21. Provide all documentation of the Toxicity Reduction Evaluations (TREs) performed required by Permit Section I.L along with any letters from MDE requiring said testing.
  22. An inspection conducted by MDE on February 22, 2013 indicated that a lateral connected to Outfall 001 had been repaired due to a lack of flow present from Outfall 001. Please provide:
    - a. A narrative of how this problem was discovered, including dates of discovery;
    - b. Any documentation related to the discovery of this problem, including CCTV footage taken, evaluations performed, or testing performed;
    - c. Provide any documentation available to certify the completion of this repair, including dates of repair processes and completion;
    - d. Provide a narrative and any documentation of investigations or other follow-up work performed to address how effluent flow from this defective lateral may have impacted the surrounding environment.
  23. Provide a description on the method(s) used to measure flow at Outfall 001 according to Permit Section I.G. In your response include a narrative description of plant specific factors, such as batch flows and operational factors that would affect flow rates. Include all documentations of flow measurements dating back to December 1, 2009 from Outfall 001.